

# Our Code of Conduct



# Contents

Introduction .....	3
Foreword: Our business principles .....	5
How to apply the Code of Conduct .....	7
Our Whistleblower System for reports of violations.....	9
Compliance.....	10
Anti-Bribery and Corruption.....	11
Competition .....	12
Trade Compliance.....	13
Human Rights .....	14
Information Privacy and Protection .....	15
Conflict of Interest .....	16
Suppliers .....	17
Resources .....	18
Health & Safety.....	19
Fair Employment Practices.....	20
People Development .....	21
Environmental Responsibility .....	22
Products and Solutions Responsibility.....	23
Diversity .....	24
Diversity and Inclusion .....	25
Non-discrimination and Harassment.....	26
Social Engagement.....	27
Supporting Communities.....	28
Trustworthy Communication.....	29





# Introduction to Our Code of Conduct

**Our Code of Conduct** is a summary of important rules and principles that guide our business decisions and behavior.



# Our business principles

**All over the globe**, our employees represent Trelleborg as a “world leader in engineered polymer solutions.” One of the strong foundations of this world leadership is that we must act responsibly and create added value for our stakeholders without compromising the high standards we have set ourselves.

Our Code of Conduct is a summary of the most important rules and principles that guide our business decisions and behavior. These rules and principles need to be clearly understood by everyone in the organization, regardless of position, and they are valid in all markets and at all times.

This Code of Conduct reflects that we support and operate our business in accordance with the Ten Principles of the UN Global Compact, the general concepts expressed in the International Labour Organization (ILO) conventions, the OECD Guidelines for Multinational Enterprises and the UN Declaration of Human Rights.

Together with our Corporate Governance framework and our Group Policies, our Code of Conduct provides the framework of rules for our operations. It is the duty of each manager to ensure that employees understand the Code of Conduct, and we will provide tools to support this.

Trelleborg requires suppliers, sales agents, distributors and consultants to adopt the principles in this Code of Conduct. We also encourage support of the principles in the UN Global Compact, which we signed in 2007.

The Trelleborg Code of Conduct has been completely revised and approved to this format in January 2019, replacing the previous version from 2007.



Hans Biörck  
Chairman of the Board



Peter Nilsson,  
President and CEO

# How to apply the Code of Conduct

**The Code of Conduct** emphasizes and summarizes existing Trelleborg Group Policies and should be applied as a support tool laying down the basic rules and principles on which day-to-day work is based, and to help resolve issues we may face.

- Our Code of Conduct sets the framework of rules and the boundaries for our business decisions and behavior.
- Our Core Values – Customer focus, Performance, Innovation and Responsibility – describe the business mindset of Trelleborg and Trelleborg employees.

Our continued success will depend on how we all apply this behavior and mindset – both conduct and values – within our business environment. Obviously, breaching applicable laws or the Code of Conduct can result in severe penalties for our Group or any individual involved, and may have damaging effects for the reputation of the Group.

Any director or employee who is found to have violated our Code of Conduct or any of the underlying Group Policies will be subject to disciplinary action, which may ultimately lead to dismissal and criminal proceedings.

Please keep the following in mind:

- **Where do I find the Code?** The current version of the Code of Conduct, as well as all our policies, manuals and recommendations, can be found on our Group Intranet.
- **Is it enough for me to know the Code?** The Code of Conduct is a summary. You will find more information about each of its topics in the more detailed our Group policies, directives.
- **What else is required of me?** Although you are not expected to know all the details of every legal requirement applicable to our business, you are indeed responsible for understanding requirements that are directly applicable to your position and employment.
- **When do I seek help?** You need to understand the business environment in which your part of the Group operates well enough to know when to seek internal advice or inform your immediate manager.
- **How do I get training?** It is the duty of Trelleborg managers to include Code of Conduct in employee training. Every new employee should be given the opportunity to read and discuss the Code. Trelleborg regularly conducts training, in e-learning format as well as in classic classroom format, and provides information to support and comply with the Code of Conduct.

# Our Whistleblower system for reports of violations

**The Group's Whistleblower system** shall be used when there is reason to suspect that laws, human rights or the Code of Conduct are being violated. Possible such violations include corruption, fraud or harassment.

Every employee in the Group should, without fear of reprisal from anyone, use the Whistleblower system to inform our SVP General Counsel and SVP Human Resources of any such improper activity.

## **Using the Trelleborg Whistleblower Hotline:**

When you want to leave a message:

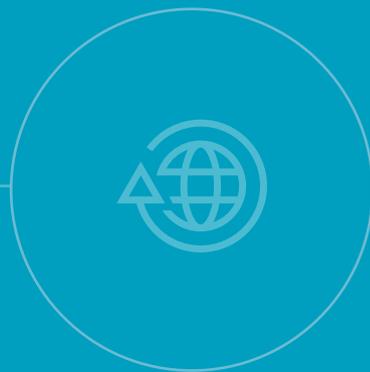
- Use the telephone, or the Web at: [www.trelleborg.com/whistleblower](http://www.trelleborg.com/whistleblower)
- You can use your own language
- Your anonymity is protected

To find relevant phone numbers and other instructions, go to the Group Intranet and search for Whistleblower.



# Compliance

Our business activities and relations with customers, business partners and authorities are characterized by sound business ethics and respect for human rights.



# Anti-Bribery and Corruption

## WHY?

Trelleborg truly believes in the concept of having a fair and transparent marketplace. Therefore we have zero tolerance for the offering, solicitation or acceptance of any form of bribes or other corrupt behavior.

## WHAT?

A bribe includes any type of payment, kickback, or gift regardless of value if it is made to gain a business advantage, it violates applicable laws or is contrary to customary business practice. It covers payments made indirectly, through a third party, or to a family member or friend.

Gifts, entertainment, compensation or personal favors may be offered to a third party only if they are modest in value and consistent with applicable laws and customary business practice. The remuneration of agents shall be appropriate and for legitimate services only.

## HOW?

We use continuous training and proactive information measures to prevent bribery and corruption, and we train and follow up our activities to combat bribery and corruption, as well as money-laundering and extortion in a transparent manner.



# Competition

## WHY?

We believe that fair competition is in the best interest of our Group, our customers and society as a whole.

## WHAT?

Agreements or understandings with a competitor regarding prices (to fix, raise, stabilize or lower prices, or to eliminate or reduce competition) or regarding allocation of customers (groups of customers, lines of business, products or geographic areas) are unlawful. Even an informal, unwritten understanding about a common purpose might be illegal.

## HOW?

We train and support our employees to ensure that they are knowledgeable about applicable competition law. Agreements that are particularly sensitive with regard to competition law must not be negotiated or entered into without the involvement of Group Legal.



# Trade Compliance

## **WHY?**

Trade sanctions and embargoes are commercial and financial penalties imposed by countries. As a Group, we are involved in business in all parts of the world and we respect and follow applicable sanctions and rules related to cross-border trade.

## **WHAT?**

We must at all times comply with applicable trade compliance requirements, such as sales to countries affected by sanctions/embargoes or other import and export laws and regulations.

## **HOW?**

Anyone involved in any such type of business activity needs to adhere to our internal Export Trade Approval process. We work to ensure awareness of trade compliance requirements by offering training sessions, by assessing exports to sanctioned countries and conducting checks on third parties.

For business opportunities in ongoing conflict zones, due diligence is required to avoid any association with infringements of human rights by either side.



# Human Rights

## WHY?

Human rights reflect the minimum standards necessary for people to live with dignity and give people the freedom to choose how they live and how they express themselves. In addition, human rights protect people against abuse by those who are more powerful.

Therefore, Trelleborg respects human rights wherever we operate.

## WHAT?

No children under the compulsory school age of 15 years (or higher in certain countries) are allowed to work for Trelleborg, and no hazardous work is allowed for those under 18 years of age. Our suppliers and sub-contractors must adhere to similar standards.

We do not tolerate illegal, forced or bonded labor in our own operations, in the operations of our suppliers or any other parties with whom we cooperate.

## HOW?

We continuously assess risks of human rights infringements, and act to prevent them within our supply chain. We acknowledge that forced labor and human trafficking is a growing issue to be addressed.



# Information Privacy and Protection

## WHY?

For the sake of integrity and in order to maintain and protect the fundamental rights and freedoms of individuals, we are at all times committed to respecting the privacy of any personal data which we process. As employees, we are all required to follow applicable rules and contractual commitments on confidentiality.

## WHAT?

We are always careful regarding the Group's critical information and information that may be confidential, including any information that could potentially affect our share price.

We will secure that any information related to an identified or identifiable natural person is handled in a compliant manner.

## HOW?

When handling personal data or confidential information about the Group as part of your responsibilities, you must be aware of and comply with non-disclosure agreements, local regulations and all applicable Group policies and directives.



# Conflict of Interest

## WHY?

Actual or potential conflicts of interest may corrupt the motivation or decision-making of an individual or organization.

## WHAT?

Employees shall avoid all situations in which there is a potential conflict of interest, such as family financial interests in, or indebtedness to, enterprises that have significant business relations with Trelleborg, or family relationships with Government officials.

Employees should also avoid situations where business judgment could be affected by hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships and close relationships with an entity that competes with or engages in business with the Trelleborg Group.

## HOW?

At the managerial level, Trelleborg does not accept outside employment without specific approval from the head of the business unit concerned, in accordance with the “Grandparent Principle” (i.e. an approval from the level above is also required).

With the help of training, we work to create awareness about conflicts of interest. As soon as you become aware of facts giving rise to a conflict of interest you must notify your manager. A failure to do this could be considered a breach of the Code of Conduct.



# Suppliers

## **WHY?**

We require our suppliers to adhere to the principles in our Code of Conduct.

## **WHAT?**

We insist that suppliers follow legal as well as human rights requirements and that they work actively to reduce negative environmental and health impacts from processes, services and products. We encourage suppliers to implement certifiable environmental management systems.

## **HOW?**

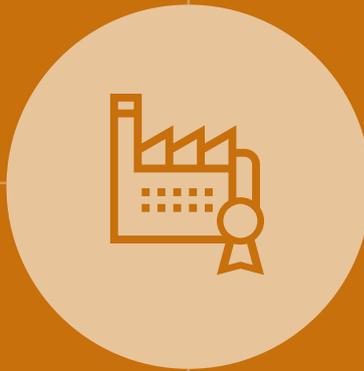
We continuously assess our suppliers from a corporate responsibility perspective.

If a supplier is found to be non-compliant, we demand corrective measures. Serious non-compliances will eventually lead to termination of the relationship.



# Resources

Our people's health and safety must be safeguarded and their professional skills developed. We are committed to fairness and better sustainability not only for our own operations, but for customers and society as a whole.



# Health & Safety

## WHY?

Workplaces that are not safe may jeopardize the safety of the employees working there as well as putting their health at risk. Therefore, safe workplaces according to common global standards is a minimum requirement at all of our locations.

## WHAT?

We give employees appropriate training and instructions for safe work. All employees are expected to follow safety instructions and to engage in safety improvement activities, including reporting of near-misses and hazards.

## HOW?

We proactively reduce the risk and effects of work accidents and involve our employees in the process. We support activities to promote the good health of our employees.

We instruct contractors in relevant health & safety matters, and expect them to follow relevant regulations and Trelleborg-specific safety instructions.

For health as well as safety reasons it is never acceptable to be intoxicated or under influence of drugs at work.



# Fair Employment Practices

## WHY?

We believe in and promote fair employment practices, for ourselves and our suppliers, including not only a fair salary but also fair conditions when it comes to the nature, the volume and the duration of the work.

## WHAT?

We respect our employees' right to be represented by unions and to join or not join an association of their free choice, as well as their right to take part in collective bargaining.

We pay salaries and benefits that are market competitive and based on performance. We strive to apply the "equal pay for equal work" principle.

## HOW?

Working hours, vacation and parental leave are always in accordance with local law and collective agreements. Employees are entitled to a minimum of one day off in seven in all countries.



# People Development

## **WHY?**

We believe in providing opportunities that enable and engage our employees to grow and further develop their careers. This is beneficial not only for the individual but also for Trelleborg.

## **WHAT?**

We encourage our employees to take responsibility for their professional and personal growth and development, as well as for sharing experiences and knowledge with the rest of the organization.

## **HOW?**

We carry out employee surveys at regular intervals to encourage two-way communication about how we create a great place to work together.

We foster a coaching leadership culture that drives trust and engagement. This is to ensure that we empower our employees to contribute to an inspiring environment.



# Environmental Responsibility

## WHY?

Human impact on the environment is undisputed, and we must all ensure that ecosystems are protected for future human generations. We are well aware that conflicts may rise between meeting commercial needs and protecting nature's resources.

## WHAT?

In all our activities we aim to use materials and energy as efficiently as possible and improve recovery, and therefore we train and inform our employees about how to avoid unnecessary scrap, waste and emissions – including emissions of greenhouse gases.

In our processes and products, we take particular precautions regarding health and environmental effects from chemical substances, as well as excluding conflict.

## HOW?

All relevant production and development units shall implement and maintain a certified environmental management system in accordance with ISO 14001.

Environmental, as well as health and safety aspects shall be assessed in the development of our products and processes, supporting circular economy and efficient use of resources.



# Products and Solutions Responsibility

## **WHY?**

We aim to assess and then address all foreseeable environmental, health, and safety-related effects associated with our main products and solutions over their full life-cycle.

## **WHAT?**

Trelleborg's products and solutions should contribute to making our customers as well as the entire society more sustainable.

With regard to customer health and safety, our products shall not contain substances considered harmful. They shall also meet applicable and legal standards, including health warnings, product safety and information labels.

## **HOW?**

We offer accurate and clear information regarding our products and solutions to enable our customers to make informed decisions. This includes sustainability benefits and life-cycle aspects: Product performance, content, safe use, maintenance, storage and disposal.

We provide transparent and effective procedures to address customer complaints and to contribute to a fair and timely resolution of product liability disputes.



# Diversity

We are all responsible for creating a diverse and inclusive workplace. We help our employees to be their best, by treating everyone with respect.



# Diversity and Inclusion

## WHY?

For Trelleborg, diversity and inclusion is a strength as it benefits the organization and our business. Diversity is the collective mix of differences and similarities in perception and approach that enables diverse thinking to take place. Inclusion is the active process of inviting and valuing the unique characteristics and contributions of each employee.

## WHAT?

Our aim is that all our employees feel involved and empowered – to help them achieve their full potential. The combination of inclusion and diverse thinking is one of the important factors that leads to excellent performance.

## HOW?

We actively train our employees in diversity matters, including awareness and respect for cultural differences.

We work to achieve a well-balanced mix of genders, ethnicities and ages in our operations. Therefore, we strive to hire and develop local employees and managers, as well as to increase the percentage of female managers.

To achieve more diversified workplaces, we actively want to avoid biased decisions in recruitments.



# Non-discrimination and Harassment

## **WHY?**

We respect our employees and their human rights.

## **WHAT?**

Employment or assignment decisions must be based on individual merit and business needs, irrespective of gender, race, religion, age, disability, sexual orientation, nationality, political opinions, or social or ethnic origin.

We define harassment – including sexual harassment – as all unwelcome conduct which reasonably makes a person feel offended, humiliated or intimidated.

Employees shall not harass or discriminate against any colleague or business partner for any reason.

## **HOW?**

With the help of training, we actively work to promote non-discrimination and harassment. All complaints of harassment will be taken seriously and treated with respect and in confidence. Any person found to have harassed another will face disciplinary action.



# Social Engagement

We support local communities wherever we operate. Our voice in society is characterized by openness and correctness.



# Supporting Communities

## **WHY?**

We want to contribute to a better society by supporting local communities where we operate.

## **WHAT?**

We want to be respected for our corporate citizenship. Typically, our support goes to educational, development or integration initiatives for young people.

We understand our role as a tax payer in support of public welfare.

## **HOW?**

We prioritize support or sponsorships that benefit the societies and environments where we conduct our operations, and which support our values and strengthen our relations with customers and partners.

We do not make contributions to political parties or to individual politicians.



# Trustworthy Communication

## WHY?

Our communication shall be based upon clarity and strong ethics.

## WHAT?

Trelleborg's corporate culture is characterized by open and trustworthy communication at all levels within the organization and between employee groups.

External communication is subject to certain disclosure restrictions given legislation, standards and agreements relating to the stock exchange, customers, other third parties and employment.

## HOW?

With transparent communication, our employees become involved in the Group's development. Knowledge of Trelleborg's values, business objectives and strategies is enhanced, thereby strengthening employee commitment.

Use of the common Group Intranet to share information is encouraged.



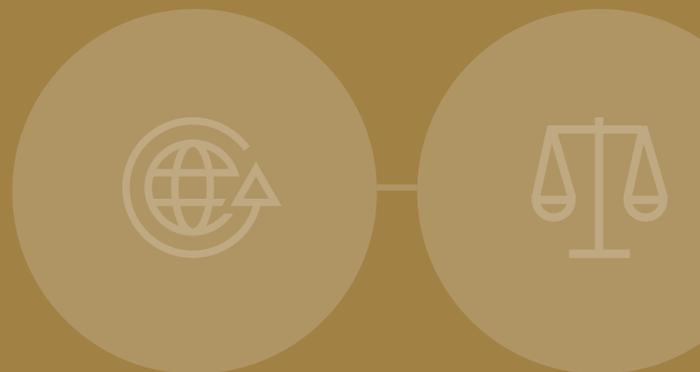
### EXTERNAL DISCLOSURE RESTRICTIONS:

- External statements on behalf of the Trelleborg Group may only be made by the CEO, CFO, and the heads of Group Communications and Investor Relations – they are Group's official spokespersons.
- Other managers are spokespersons within their area of responsibility.
- Employees should only make statements on facts already known internally and externally, or on matters where they have specialist knowledge.

Trelleborg is a world leader in engineered polymer solutions that seal, damp and protect critical applications in demanding environments. Its innovative solutions accelerate performance for customers in a sustainable way.

The Trelleborg Group has annual sales of about SEK 34 billion and operations in about 50 countries. The Group comprises five business areas: Trelleborg Coated Systems, Trelleborg Industrial Solutions, Trelleborg Offshore & Construction, Trelleborg Sealing Solutions and Trelleborg Wheel Systems.

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